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Re: MC2012-26 - Proposed PO Box Service Changes

I am writing to formally comment on the proposed PO Box service changes under consideration. I am the owner of a small, private MPC that offers a variety of services, including most postal services and Private Mail Box rental (as a Commercial Mail Receiving Agent – CMRA). I am also a member of the USPS Approved Shippers Program. I have a serious concern about the potential negative impact these enhancements would have on my business. Furthermore, I believe that the USPS would gain an unwarranted and unjustified significant competitive advantage over private sector businesses like mine.

These service changes have been well documented by others so I will not go into great detail, but they include street style addressing, email notification and private carrier package delivery. When the inevitable 5-day delivery occurs, there is also the unfair possibility of Saturday delivery to PO boxes, but not to Private Mail boxes. In addition, I am bound by CMRA regulations that create additional time and costs that the USPS does not incur.

At the heart of the matter is the issue of fair competition. Personally, I do not like the notion of being put at a significant competitive disadvantage by a quasi-government institution that has a seemingly unlimited advertising budget without apparent accountability to profit and loss. That is difficult to compete against. I have no issues with competition itself (in fact, I welcome it as a challenge to earning someone's business). All I ask for is a level playing field. I prefer not to play the game with one arm tied behind my back (why should I have to?). I accept all the risks and challenges and costs (including paying all sorts of taxes) of owning a small business. My family and my employees' families depend on this business to support themselves and contribute to society in a very positive manner. A very important profit center of my business would be directly threatened by these proposed changes. Quite frankly, it is not fair.

Lastly, I would like to address the importance of maintaining healthy working relations between the USPS and businesses like mine. I consider all the vendors that I use to be somewhat of a partner to me. They obviously want me to sell their products and services and I want to do so while earning a reasonable profit. By design, it should be a win/win situation. I have an excellent working relationship with the USPS branch which is a mere two miles from store. I sell a ton of postal services and my pickup person has to make several trips every day to carry it all out of my store. I save my local branch many, many clerical hours by selling their services for them. Without me, their expenses would rise significantly. I help them and they help me, just like it is supposed to be.

At the 2011 National Postal Forum, Postmaster General Patrick R. Donahoe made reference to the vital role that MPCs (in the Approved Shippers Program) will have as the USPS tries to

increase business and return to profitability. As more and more local USPS branches are closed and/or their hours restricted, MPCs will be needed to fill that void. We have to be a “going concern” in order for that to happen. We can’t lose money and continue to exist like the USPS can. Threatening an important profit center of my business threatens my business itself. It is my wish to always consider the USPS an important “business partner” of mine. But, if I am unfairly losing business to my “partner”, I am going to find it very difficult to consider this entity a true partner in the future. So, it is my hope that the “powers to be” take into consideration all the variables and potential impacts that these changes could have. For all of this to work, it must be win/win. The playing field must be level. If it is not, then it will be lose/lose and the only ones who could possibly like that would be UPS and Fedex.

Sincerely,

Michael A. Weilhammer